

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
WENDY RAYMOND,

*Plaintiff,*

– against –

GEOVANES DIAS DE ARAUJO and  
ES EXPRESS TRANSPORT, INC.,

*Defendants.*  
-----X

**PLEASE TAKE NOTICE**, that upon the Affirmation  
affirmed on September 25, 2023, and Memorandum of Decision  
Wendy Raymond will move this Court in Courtroom 52  
at 300 Quarropas Street, White Plains, New York 10601

forenoon, or as soon thereafter as counsel may be heard, for an Order remanding the above  
captioned action to Supreme Court for the State of New York, Rockland County, pursuant to 28  
U.S.C. §1447(c), as well as Rule 12(b)(1) and Rule 12(h)(3) of the Federal Rules of Civil  
Procedure, and for such other and further relief as this Court may deem to be just, proper, and  
equitable, including reasonably attorney's fees.

**PLEASE TAKE FURTHER NOTICE**, that in accordance with Rule 6.1(b) of the Joint  
Local Rules for the Southern District of New York, any opposing affidavits and answering  
memoranda shall be served within fourteen (14) days after service of the Plaintiff's moving papers,  
whereafter any reply affidavits and memoranda of law shall be served within seven (7) after service  
of the answering papers.

**NOTICE OF MOTION  
FOR REMAND**

**CASE No.: 7:23-cv-07578 (PMH/SDA)**

**HON. PHILIP M. HALPERN, D.J.**

Defendants are directed to file their opposition, if any,  
to Plaintiff's Motion for Remand (Doc. 8) by October  
18, 2023 at 5:00 p.m.

SO ORDERED.




Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
October 11, 2023

**Dated:** September 25, 2023  
New York, New York

**MORGAN & MORGAN NY, PLLC**

By:   
\_\_\_\_\_  
Andrew L. Boughrum, Esq.  
*Attorneys for Plaintiff*  
350 Fifth Avenue, Suite, 6705  
New York, New York 10118  
T: (201) 209-3438  
E: [ABoughrum@forthepeople.com](mailto:ABoughrum@forthepeople.com)

**TO: NASH CONNORS, P.C.**  
Attn: Philip M. Gulisano, Esq.  
*Attorneys for Defendants*  
344 Delaware Avenue, Suite 400  
Buffalo, New York 14202  
T: (716) 842-4121  
E: [Gulisano@nashconnors.com](mailto:Gulisano@nashconnors.com)